

# Hope for the Flowers

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May 4, 1999

Re: Docket # 98N-1038, "Irradiation in the Production, Processing, and Handling of Food"

Food and Drug Administration  
Dockets Management Branch (HFA-305)  
5630 Fishers Lane, Room 1061  
6 Elm Street  
Rockville, Maryland 20852

To Whom It May Concern:

I am opposed to irradiation for many reasons. However since limited to the labeling issue, I will reluctantly address only this. We deserve freedom of choice, especially when the question of safety and food quality of new technologies is not proven. The FDA has the duty to inform us of what we are eating.

The FDA should retain the current labeling law and strengthen it. Certainly not weaken or make it less clear and more subtle. The current terminology of "treated with radiation" or "treated by irradiation," and the use of the radura symbol on all irradiated whole foods should be even more obvious than in the past. Your job is to safeguard us, not the companies who will profit, or be inclined to even more unclean practices by this illusion of safety.

Regarding the issue of labeling, in its initial petition, the FDA concluded that irradiation was a "material fact" about the processing of a food, and thus should be disclosed. The material fact remains; therefore, labeling should remain. Consumer acceptability, storage qualities and nutrients are affected. Some irradiated foods have different texture and spoilage characteristics than untreated foods. Most fruits and vegetables have nutrient losses that are not obvious or expected by the consumer.

In addition, processing by irradiation causes chemical changes that are not evident and are potentially hazardous. Meat may have a higher level of carcinogenic benzene. All irradiated foods contain unique radiolytic products that have never been tested.

Whether or not the FDA has approved irradiation as safe, this new technology has no long-term human feeding studies which prove safety. Consumers certainly have a right to know if this process has been used on their food.

As to the kind of label used, I believe that label should be large enough to be readily visible to the consumer, on the front of the package.

The label contains important information regarding the processing of the contents. For displayed whole foods such as produce, a prominent informational display similar to that used for meats should be used (but containing the term "irradiation" and the radura). Restaurants or packaging that include irradiated food and/or ingredients should also label.

Because of the newness of the technology and the need to assess the public health effects of widespread use of irradiated foods, I believe that the FDA's labeling requirement should not be permitted to expire.

I wish to stand in all matters for the right to know and the precautionary principle.

Yours truly,

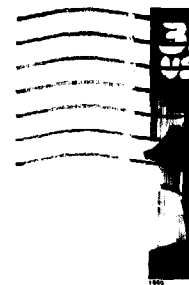
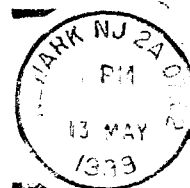


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